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December 30, 2020

VIA EMAIL

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Re: **In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**
Civ. No. 19-2875 (D.N.J.)

Counsel:

Pursuant to the Court's Case Management Order No. 8 (Electronic Discovery Protocol – Stipulated) (Doc. 127) and the Court's August 27, 2020 Order (Doc. 564), defendants Zhejiang Huahai Pharmaceutical Co., Ltd ("ZHP"), Princeton Pharmaceutical Inc. ("Princeton"), Solco Healthcare US, LLC ("Solco"), and Huahai US, Inc. ("Huahai"), collectively the "ZHP Parties" are serving, via email, logs detailing all documents that have been withheld or redacted to date on the basis of privilege or the state secrecy laws of the People's Republic of China. The aforementioned logs also include documents withheld or redacted by ZHP's non-party subsidiaries Prinbury Biopharm and Shanghai Syncores, both of which voluntarily produced documents in this litigation.

Both the Privilege Log and the State Secret Log include documents from each of the aforementioned six entities, and they are consolidated in this manner for purposes of efficiency.

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By itemizing documents on the same logs, the ZHP Parties, Prinbury Biopharm, and Shanghai Syncores do not waive any rights or defenses they have as separate and distinct corporate entities.

The service of these logs is made subject to the objections made by counsel during the December 11, 2019 conference with Judge Schneider as well as counsel's jurisdictional objection to producing documents and information from two foreign non-parties, Prinbury Biopharm and Shanghai Syncores. The ZHP Parties, Prinbury Biopharm, and Shanghai Syncores reserve any and all objections as to relevance, materiality, privilege, admissibility, or any other grounds on which an objection may be made.

Very truly yours,

/s/ Jessica Priselac

Jessica Priselac

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